

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE ASTRAZENECA PLC  
SECURITIES LITIGATION

Case No.: 1:21-cv-00722-JPO

**STIPULATION AND ORDER**

WHEREAS, on January 26, 2021, Plaintiff Monroe County Employees' Retirement System filed a putative class action complaint (the "Complaint") in Case No. 1:21-cv-00722-JPO (S.D.N.Y.) (the "Monroe County Case") asserting claims pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 promulgated thereunder against the Defendants AstraZeneca PLC ("AstraZeneca"), Pascal Soriot, Marc Dunoyer, and Menelas Pangalos (the "Individual Defendants" and, together with AstraZeneca, "Defendants");

WHEREAS, on January 29, 2021, Plaintiff Vladimir Zhukov filed a putative class action complaint in Case No. 1:21-cv-00825-JPO (S.D.N.Y.) (the "Zhukov Case," and together with the Monroe County Case, the "Actions") asserting claims pursuant to Sections 10(b) and 20(a) of the Exchange Act and Rule 10b-5 promulgated thereunder against Defendants, and designated his case as related to the Monroe County Case;

WHEREAS, on March 2, 2021, the Court entered an Order (the "March 2 Order") (i) extending the time for any Defendant to answer, move, or otherwise respond to the complaints until a date to be agreed to by the parties following the Court's appointment of Lead Plaintiff pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4; and (ii) ordering that within 10 days after the Court enters an order appointing Lead Plaintiff, counsel for Defendants and Lead Plaintiff shall confer and jointly submit a proposed schedule for the filing or designation

of an operative complaint, and for the time for Defendants to move or dismiss or otherwise respond to that complaint (ECF No. 11);

WHEREAS, on April 28, 2021, the Court entered an Order (i) consolidating the Actions; (ii) appointing Nuggehalli Balmukund Nandkumar and Wayne County Employees' Retirement System as Lead Plaintiffs; and (iii) appointing Robbins Geller Rudman & Dowd LLP and Pomerantz LLP as Lead Counsel (ECF No. 32); and

WHEREAS, pursuant to the March 2 Order, Lead Plaintiffs and Defendants (collectively, the "Parties") have met and conferred and, for the convenience of the Parties and the Court, hereby enter into the following stipulation, subject to review by the Court, regarding the schedule in this matter.

**IT IS HEREBY STIPULATED AND AGREED**, by and among the Parties, through their undersigned counsel, subject to the approval of the Court, as follows:

1. Defendants' counsel agrees to accept service of the Complaint on the Individual Defendants' behalf, subject to an express reservation of all rights, defenses, or other objections, including jurisdictional defenses, with the sole exception of insufficient service of process.

2. Lead Plaintiffs shall file a consolidated amended complaint or designate an operative complaint (the "Consolidated Amended Complaint") by the later of sixty (60) days after entry of the Order approving this stipulation or July 9, 2021.

3. Defendants shall file their motion to dismiss or otherwise respond to the Consolidated Amended Complaint by the later of seventy-five (75) days after Lead Plaintiffs file the Consolidated Amended Complaint or designate an operative complaint or September 22, 2021.

4. If Defendants file a motion to dismiss (the "Motion to Dismiss"), Lead Plaintiffs shall file their opposition (the "Opposition") by the later of sixty (60) days after Defendants file

their Motion to Dismiss or November 22, 2021.

5. If Defendants file a Motion to Dismiss, Defendants shall file their reply to Lead Plaintiffs' Opposition by the later of forty-five (45) days after Lead Plaintiffs file their Opposition or January 10, 2022.

6. Nothing in this Stipulation shall be construed as a waiver of any argument, defense or right available to any Party.

Stipulated and agreed to on this 10<sup>th</sup> day of May 2021 by:

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DOWD LLP**

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*Additional Counsel for Lead Plaintiff  
Nuggehalli Balmukund Nandkumar*

**SO ORDERED this 11th day of May, 2021**

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J. PAUL OETKEN  
United States District Judge